

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LONE STAR COLLEGE
SYSTEM DISTRICT,

Plaintiff,

v.

MICHAEL S. MOATES,

Defendant.

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Civ. A. No. 4:21-cv-03023

Joint Motion to Remand

Plaintiff Lone Star College System District and Defendant Michael S. Moates file this Joint Motion to Remand and show the Court as follows:

Lone Star College filed a lawsuit against Moates in the 333rd Judicial District Court of Harris County, Texas on August 31, 2021. The matter was assigned cause number 2021-55140. Lone Star College asserts a single cause of action: breach of contract.

Moates and Lone Star College resolved the matter and the state court signed an Agreed Permanent Injunction prior to when Moates' removal was filed.

Lone Star College and Moates move to remand this matter because proceedings in federal court are no longer desired by Moates and the parties have resolved the case by agreement and Agreed Permanent Injunction. Moreover, Lone Star College asserts that the Court lacks jurisdiction over this case, as there is no federal question or diversity between the parties.

For all these reasons, Lone Star College and Moates respectfully request that the Court enter an order remanding this case to the 333rd Judicial District Court of Harris County, Texas.

Respectfully submitted,

Gray Reed & McGraw LLP

/s/ Stephen J. Quezada

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Pro Se Defendant

Certificate of Service

I hereby certify that on September 20, 2021, I served a copy of the foregoing document via the ECF system, as follows:

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/s/ Stephen J. Quezada

Stephen J. Quezada